

# Statement of Basis of the Federal Operating Permit

GCC Permian, LLC

Site Name: Odessa Cement Plant  
Physical Location: 16501 West Murphy  
Nearest City: Odessa  
County: Ector

Permit Number: O1125  
Project Type: Renewal

The North American Industry Classification System (NAICS) Code: 327310  
NAICS Name: Cement Manufacturing

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

- A description of the facility/area process description;
- A basis for applying permit shields;
- A list of the federal regulatory applicability determinations;
- A table listing the determination of applicable requirements;
- A list of the New Source Review Requirements;
- The rationale for periodic monitoring methods selected;
- The rationale for compliance assurance methods selected;
- A compliance status; and
- A list of available unit attribute forms.

Prepared on: February 18, 2019

## **Operating Permit Basis of Determination**

### **Permit Area Process Description**

The Odessa Cement Plant has the following main processing steps.

1) Raw Material Handling: Raw materials are mined through a process of drilling and blasting. The materials derived from this process are then picked via Front End Loader (FE-Loader) and deposited in a truck for transport. The truck then travels approximately 3/4 of a mile where the materials are unloaded into a below grade hopper where they enter the primary crusher system for processing. Alternatively, materials can be stockpiled on the ground and the crusher hopper fed from the storage piles by FE-loaders. The crusher is enclosed and vented to bag house. The crusher discharge belt delivers materials to the raw material delivery belt which is equipped with a moveable tripper belt. Materials are transferred to the raw mill feeder belt via feeders located beneath the storage piles in the covered storage area. Outside materials are introduced into the system by charging an auxiliary hopper by FE-loader which feeds the crusher discharge belt and delivers materials to the covered storage area above the raw mill feeders. In addition to the quarried materials, some raw materials used in the process are brought in from off-site sources and stored in the pile until it is needed to blend with the quarried material. Then it is moved via FE-loader to a feeder where it is dropped below grade feeder belt and transferred to the secondary crusher system.

2) Solid Fuel Handling: The solid fuel at the Odessa Plant is delivered by rail by dropping the solid fuel into an underground hopper where it is diverted by conveyor belt to temporary stacker piles by transfer to a stacker belt. The solid fuel is then transferred by FE-loader to a long-term storage pile where FE-loader removes the solid fuel it needs to feed to the system. The solid fuel is fed through a hopper by FE-loader which charges the coal conveyor. The coal conveyor transfers to the coal bin belt which delivers materials to the solid fuel bins. Each of the two fuel bins are controlled by a bag house. From the solid fuel bins coal is transferred to coal mill via weight belt feeders. Coal is pneumatically conveyed from the mill into the kiln.

3) Pyro-Handling: There are two Kilns. The #1 Kiln is a long dry process kiln in which the finely ground and dried raw materials are fed to the kiln by air slide where it enters bucket elevator and travels up to a transfer point. The material is fed through the kiln hood where it is heated by the counter flow of hot gases generated at the burner end of the kiln. The raw material undergoes physical change as it is calcined to form lime and sintered to form clinker. The kiln exhaust gases exit through a bag house. Clinker falls from the kiln into an under-grate cooler which utilizes ambient air to cool the hot clinker. The #2 kiln is equipped with a pre-heater. The pre-heater allows early calcination of the material prior to entering the kiln. The exhaust gases pass through a bag house.

4) Clinker Handling and Finishing: The finish additives gypsum and anhydrite are delivered by rail on an elevated track where the additives are dropped into a concrete bunker and moved via FE-loader to the outside storage piles. The additives are then moved via FE-loader to the feeder piles which drop to a reclaim belt conveyor by under-grate feeders. Four bins are utilized to feed materials to each of three finish mills. The bins deliver materials via weight feeders and conveyor belts to each of the finish mills. These transfers including the drops to the bins are controlled by bag houses. Cement is produced by grinding mixer of clinker and gypsum and/or anhydrite.

5) Cement Storage and Loading: The finished product is conveyed from the finish mills to tunnel belt conveyor. This transfer is enclosed and controlled by bag houses. Finished cement can also be delivered to the storage silo area via rail car. Rail cars can be unloaded into an under-grate hopper controlled by boot enclosure to a bucket elevator. The bucket elevator is controlled by a bag house. The cement is then delivered to a rotary feeder into a feed bin where the product is transferred into packing machine and sacked for transport. The bagging areas are controlled by bag houses.

### **FOPs at Site**

The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

## Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	VOC, SO <sub>2</sub> , PM, NO <sub>x</sub> , HAPS, CO
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## Reading State of Texas's Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as “applicable requirements”) that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
  - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
  - Additional Monitoring Requirements
  - New Source Review Authorization Requirements
  - Compliance Requirements
  - Protection of Stratosphere Ozone
  - Permit Location
  - Permit Shield (30 TAC § 122.148)
- Attachments
  - Applicable Requirements Summary
    - Unit Summary
    - Applicable Requirements Summary
  - Additional Monitoring Requirements
  - Permit Shield
  - New Source Review Authorization References
  - Compliance Plan
  - Alternative Requirements
- Appendix A
  - Acronym list
- Appendix B
  - Copies of major NSR authorizations

### General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

### Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that

applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

## Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the "index number," detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

## Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

## Appendix B

Copies of major NSR authorizations applicable to the units covered by this permit have been included in this Appendix, to ensure that all interested persons can access those authorizations.

### **Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions**

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3 for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

### **Stationary Vents subject to 30 TAC Chapter 111 not addressed in the Special Terms and Conditions**

All other stationary vents subject to 30 TAC Chapter 111 not covered in the Special Terms and Conditions are listed in the permit's Applicable Requirement Summary. The basis for the applicability determinations for these vents are listed in the Determination of Applicable Requirements table.

### **Federal Regulatory Applicability Determinations**

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	Yes

Regulatory Program	Applicability (Yes/No)
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	No
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
CSAPR (Cross-State Air Pollution Rule)	No
Federal Implementation Plan for Regional Haze (Texas SO <sub>2</sub> Trading Program)	No

### Basis for Applying Permit Shields

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

### Insignificant Activities

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

1. Office activities such as photocopying, blueprint copying, and photographic processes.
2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
4. Outdoor barbecue pits, campfires, and fireplaces.
5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.

8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
9. Vehicle exhaust from maintenance or repair shops.
10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
15. Well cellars.
16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
18. Equipment used exclusively for the melting or application of wax.
19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
20. Shell core and shell mold manufacturing machines.
21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.
23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.

### **Determination of Applicable Requirements**

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at [www.tceq.texas.gov/permitting/air/nav/air\\_all\\_ua\\_forms.html](http://www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html).

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at [www.tceq.texas.gov/permitting/air/nav/air\\_supportsys.html](http://www.tceq.texas.gov/permitting/air/nav/air_supportsys.html). The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated

in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

#### Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.



### Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*
ENG-1	40 CFR Part 63, Subpart ZZZZ	63ZZZZ	<p>HAP Source = The site is a major source of hazardous air pollutants as defined in 40 CFR § 63.2</p> <p>Brake HP = Stationary RICE with a brake HP greater than or equal to 250 HP and less than 300 HP.</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.</p> <p>Service Type = Emergency use where the RICE does not operate as specified in 40 CFR §63.6640(f)(2)(ii) and (iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).</p> <p>Stationary RICE Type = Compression ignition engine</p>
ENG-2	40 CFR Part 63, Subpart ZZZZ	63ZZZZ	<p>HAP Source = The site is a major source of hazardous air pollutants as defined in 40 CFR § 63.2</p> <p>Brake HP = Stationary RICE with a brake HP greater than or equal to 100 HP and less than 250 HP.</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.</p> <p>Service Type = Emergency use where the RICE does not operate as specified in 40 CFR §63.6640(f)(2)(ii) and (iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).</p> <p>Stationary RICE Type = Compression ignition engine</p>
ENG-3	40 CFR Part 63, Subpart ZZZZ	63ZZZZ	<p>HAP Source = The site is a major source of hazardous air pollutants as defined in 40 CFR § 63.2</p> <p>Brake HP = Stationary RICE with a brake HP greater than or equal to 300 HP and less than or equal to 500 HP.</p> <p>Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.</p> <p>Service Type = Emergency use where the RICE does not operate as specified in 40 CFR §63.6640(f)(2)(ii) and (iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).</p> <p>Stationary RICE Type = 4 stroke spark ignited lean burn engine.</p>
CT-1	40 CFR Part 63, Subpart Q	63Q	Used Compounds Containing Chromium on or After September 8, 1994 = The industrial process cooling tower has not used compounds containing chromium on or after September 8, 1994.
CT-2	40 CFR Part 63, Subpart Q	63Q	Used Compounds Containing Chromium on or After September 8, 1994 = The industrial process cooling tower has not used compounds containing chromium on or after September 8, 1994.
EEF-1	30 TAC Chapter 111, Visible Emissions	R1111	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.</p>
EEF-2	30 TAC Chapter 111, Visible Emissions	R1111	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.</p>
EEF-3	30 TAC Chapter 111, Visible Emissions	R1111	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.</p>
EEF-4	30 TAC Chapter 111, Visible Emissions	R1111	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.</p>
EEF-5	30 TAC Chapter 111, Visible Emissions	R1111	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.</p>
EEF-6	30 TAC Chapter 111, Visible Emissions	R1111	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
GBH-1	30 TAC Chapter 111, Visible Emissions	R1111	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is at least 100,000 actual cubic feet per minute.</p>
GEF-3	30 TAC Chapter 111, Visible Emissions	R1111	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.</p>
GEF-9	30 TAC Chapter 111, Visible Emissions	R1111	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.</p>
GID34EX	30 TAC Chapter 111, Visible Emissions	R1111	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = After January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is at least 100,000 actual cubic feet per minute.</p>
GID5EX	30 TAC Chapter 111, Visible Emissions	R1111	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.</p>
KBH-9	30 TAC Chapter 111, Visible Emissions	R1111	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = After January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is at least 100,000 actual cubic feet per minute.</p>
KEF-10	30 TAC Chapter 111, Visible Emissions	R1111	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = After January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is at least 100,000 actual cubic feet per minute.</p>
KEF-3	30 TAC Chapter 111, Visible Emissions	R1111	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.</p>
KEF-4	30 TAC Chapter 111, Visible Emissions	R1111	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.</p>
KEF-5	30 TAC Chapter 111, Visible Emissions	R1111	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.</p>
KEF-6	30 TAC Chapter 111, Visible Emissions	R1111	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.</p>
KEF-7	30 TAC Chapter 111, Visible Emissions	R1111	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.</p>
KEF-9	30 TAC Chapter 111, Visible Emissions	R1111	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = On or before January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.</p>
KILN3	30 TAC Chapter 111, Visible Emissions	R1111	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = After January 31, 1972</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			Effluent Flow Rate = Effluent flow rate is at least 100,000 actual cubic feet per minute.
CEF-4	40 CFR Part 60, Subpart OOO	60000	<p>Baghouse Monitoring = Method 22 of 40 CFR Part 60, Appendix A-7.</p> <p>Capture System = Affected facility is using a capture system with no fugitive emissions prior to the control device.</p> <p>Construction/Modification Date = On or after April 22, 2008.</p> <p>Subpart Applicability = Affected facility is not subject to 40 CFR Part 60, Subparts F or I, and does not follow any other facility in the plant process that is subject to Subparts F or I.</p> <p>Facility Type = Crusher</p> <p>PM Concentration Method = Method 5 of 40 CFR Part 60, Appendix A-3.</p> <p>Control Device Type = Baghouse controlling emissions from an affected facility other than an individual enclosed storage bin.</p> <p>Replacement Type = Not replacing an existing facility or is other than described above.</p>
CPT-1	40 CFR Part 63, Subpart LLL	63LLL	<p>Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.</p> <p>Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.</p>
DEF-1	40 CFR Part 63, Subpart LLL	63LLL	<p>Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.</p> <p>Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.</p>
DEF-2	40 CFR Part 63, Subpart LLL	63LLL	<p>Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.</p> <p>Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.</p>
DTP-1	40 CFR Part 63, Subpart LLL	63LLL	<p>Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.</p> <p>Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.</p>
DTP-2	40 CFR Part 63, Subpart LLL	63LLL	<p>Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.</p> <p>Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
DTP-3	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2. Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards. Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.
DTP-4	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2. Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards. Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.
EEF-1	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2. Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards. Facility Type = Raw mill or finish mill Raw/Finish Mill Opacity = Conducting daily visible emissions observations according to 40 CFR § 63.1350(e).
EEF-11	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2. Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards. Facility Type = Raw mill or finish mill Raw/Finish Mill Opacity = Conducting daily visible emissions observations according to 40 CFR § 63.1350(e).
EEF-12	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2. Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards. Facility Type = Raw mill or finish mill Raw/Finish Mill Opacity = Conducting daily visible emissions observations according to 40 CFR § 63.1350(e).
EEF-13	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2. Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards. Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system. Raw/Finish Mill Opacity = Conducting daily visible emissions observations according to 40 CFR § 63.1350(e).
EEF-14	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2. Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.</p> <p>Raw/Finish Mill Opacity = Conducting daily visible emissions observations according to 40 CFR § 63.1350(e).</p>
EEF-2	40 CFR Part 63, Subpart LLL	63LLL	<p>Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.</p> <p>Facility Type = Raw mill or finish mill</p> <p>Raw/Finish Mill Opacity = Conducting daily visible emissions observations according to 40 CFR § 63.1350(e).</p>
EEF-3	40 CFR Part 63, Subpart LLL	63LLL	<p>Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.</p> <p>Facility Type = Raw mill or finish mill</p> <p>Raw/Finish Mill Opacity = Conducting daily visible emissions observations according to 40 CFR § 63.1350(e).</p>
EEF-4	40 CFR Part 63, Subpart LLL	63LLL	<p>Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.</p> <p>Facility Type = Raw mill or finish mill</p> <p>Raw/Finish Mill Opacity = Conducting daily visible emissions observations according to 40 CFR § 63.1350(e).</p>
EEF-5	40 CFR Part 63, Subpart LLL	63LLL	<p>Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.</p> <p>Facility Type = Raw mill or finish mill</p> <p>Raw/Finish Mill Opacity = Conducting daily visible emissions observations according to 40 CFR § 63.1350(e).</p>
EEF-6	40 CFR Part 63, Subpart LLL	63LLL	<p>Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.</p> <p>Facility Type = Raw mill or finish mill</p> <p>Raw/Finish Mill Opacity = Conducting daily visible emissions observations according to 40 CFR § 63.1350(e).</p>
EEF-8	40 CFR Part 63, Subpart LLL	63LLL	<p>Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.</p> <p>Facility Type = Raw mill or finish mill</p> <p>Raw/Finish Mill Opacity = Conducting daily visible emissions observations according to 40 CFR § 63.1350(e).</p>



Unit ID	Regulation	Index Number	Basis of Determination*
EEF-9	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2. Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards. Facility Type = Raw mill or finish mill Raw/Finish Mill Opacity = Conducting daily visible emissions observations according to 40 CFR § 63.1350(e).
FCLB-2	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2. Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards. Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system. Raw/Finish Mill Opacity = Conducting daily visible emissions observations according to 40 CFR § 63.1350(e).
FCLCP	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2. Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards. Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.
FCLSP-3	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2. Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards. Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.
FEF-1	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2. Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards. Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.
FEF-2	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2. Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards. Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.
GBH-1	40 CFR Part 63, Subpart LLL	63LLL	Alkali By-Pass = There is no alkali by-pass associated with the kiln or in-line kiln/raw mill. Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2. Performance Test Temperature = Less than or equal to 204° C (400° F).

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.</p> <p>Carbon Injection = Carbon injection is not employed as an emission control technique.</p> <p>Facility Type = Kiln</p> <p>Burning Hazardous Waste = The kiln or in-line kiln/raw mill either does not burn hazardous waste or is not subject to and regulated under 40 CFR Part 63, Subpart EEE.</p> <p>Control Device = No additional control device is used to comply with the mercury emission limitation.</p> <p>Alternate Hg Monitoring = No alternate Hg monitoring requirements have been approved.</p> <p>Monovent = The unit does not have a control device that exhausts through a monovalent.</p> <p>Source Classification = Existing source constructed, reconstructed or modified prior to March 24, 1998.</p> <p>COM Feasibility = The use of a continuous opacity monitor (COM), in accordance with the installation specifications of Performance Specification 1 of 40 CFR Part 60, Appendix B is not feasible.</p> <p>Alternate D/F Monitoring = No alternate D/F monitoring requirements have been approved.</p>
GEF-3	40 CFR Part 63, Subpart LLL	63LLL	<p>Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.</p> <p>Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.</p>
GID34EX	40 CFR Part 63, Subpart LLL	63LLL	<p>Alkali By-Pass = There is no alkali by-pass associated with the kiln or in-line kiln/raw mill.</p> <p>Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Performance Test Temperature = Less than or equal to 204° C (400° F).</p> <p>Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.</p> <p>Carbon Injection = Carbon injection is not employed as an emission control technique.</p> <p>Facility Type = Kiln</p> <p>Burning Hazardous Waste = The kiln or in-line kiln/raw mill either does not burn hazardous waste or is not subject to and regulated under 40 CFR Part 63, Subpart EEE.</p> <p>Control Device = No additional control device is used to comply with the mercury emission limitation.</p> <p>Alternate Hg Monitoring = No alternate Hg monitoring requirements have been approved.</p> <p>Monovent = The unit does not have a control device that exhausts through a monovalent.</p> <p>Source Classification = Existing source constructed, reconstructed or modified prior to March 24, 1998.</p> <p>COM Feasibility = The use of a continuous opacity monitor (COM), in accordance with the installation specifications of Performance Specification 1 of 40 CFR Part 60, Appendix B is not feasible.</p> <p>Alternate D/F Monitoring = No alternate D/F monitoring requirements have been approved.</p>
GID5EX	40 CFR Part 63, Subpart LLL	63LLL	<p>Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.</p> <p>Facility Type = Clinker cooler</p> <p>Monovent = The unit does not have a control device that exhausts through a monovalent.</p> <p>COM Feasibility = The use of a continuous opacity monitor (COM), in accordance with the installation specifications of Performance Specification 1 of 40 CFR Part 60, Appendix B is not feasible.</p>
GID5EX/GID6EX	40 CFR Part 63, Subpart LLL	63LLL	<p>Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.</p> <p>Facility Type = Clinker cooler</p> <p>Monovent = The unit does not have a control device that exhausts through a monovalent.</p> <p>COM Feasibility = The use of a continuous opacity monitor (COM), in accordance with the installation specifications of Performance Specification 1 of 40 CFR Part 60, Appendix B is not feasible.</p>
GID6EX	40 CFR Part 63, Subpart LLL	63LLL	<p>Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.</p> <p>Facility Type = Clinker cooler</p> <p>Monovent = The unit does not have a control device that exhausts through a monovalent.</p> <p>COM Feasibility = The use of a continuous opacity monitor (COM), in accordance with the installation specifications of Performance Specification 1 of 40 CFR Part 60, Appendix B is not feasible.</p>
GRP1	40 CFR Part 63, Subpart LLL	63LLL	<p>Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.</p> <p>Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.</p>
GRP2	40 CFR Part 63, Subpart LLL	63LLL	<p>Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.</p> <p>Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.</p>
KBH-9	40 CFR Part 63, Subpart LLL	63LLL	<p>Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.</p> <p>Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
KEF-10	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2. Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards. Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.
KEF-3	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2. Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards. Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.
KEF-4	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2. Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards. Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.
KEF-5	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2. Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards. Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.
KEF-6	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2. Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards. Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.
KEF-7	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2. Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards. Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.
KEF-9	40 CFR Part 63, Subpart LLL	63LLL	Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2. Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards. Facility Type = Raw material storage bin, clinker storage bin, finished product storage bin, conveying system transfer point, bagging system, bulk loading system, or bulk unloading system.

Unit ID	Regulation	Index Number	Basis of Determination*
KILN3	40 CFR Part 63, Subpart LLL	63LLL	<p>Alkali By-Pass = There is no alkali by-pass associated with the kiln or in-line kiln/raw mill.</p> <p>Major Source = The affected source is located at Portland cement plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Performance Test Temperature = Less than or equal to 204° C (400° F).</p> <p>Alternate Opacity Monitoring = No application has been submitted or approval has not been received for alternate monitoring requirements to demonstrate compliance with the opacity emission standards.</p> <p>Carbon Injection = Carbon injection is not employed as an emission control technique.</p> <p>Facility Type = Kiln</p> <p>Burning Hazardous Waste = The kiln or in-line kiln/raw mill either does not burn hazardous waste or is not subject to and regulated under 40 CFR Part 63, Subpart EEE.</p> <p>Control Device = No additional control device is used to comply with the mercury emission limitation.</p> <p>Alternate Hg Monitoring = No alternate Hg monitoring requirements have been approved.</p> <p>Monovent = The unit does not have a control device that exhausts through a monovent.</p> <p>Source Classification = Greenfield source constructed after 12/02/2005.</p> <p>98% Weight Reduction = The owner or operator is not electing to demonstrate compliance with the 98% by weight reduction limitation for THC.</p> <p>COM Feasibility = The use of a continuous opacity monitor (COM), in accordance with the installation specifications of Performance Specification 1 of 40 CFR Part 60, Appendix B is not feasible.</p> <p>Alternate D/F Monitoring = No alternate D/F monitoring requirements have been approved.</p>
31EF-1	40 CFR Part 60, Subpart Y	60Y	<p>Affected Facility = Coal processing and conveying equipment (including breakers and crushers), coal storage systems (excluding open storage piles), or coal transfer and loading systems</p> <p>Construction/Reconstruction/Modification Date = After October 24, 1974 and before April 28, 2008.</p> <p>Digital Opacity = The affected facility is not using a monitoring plan for a digital opacity compliance system.</p>
31EF-2	40 CFR Part 60, Subpart Y	60Y	<p>Affected Facility = Coal processing and conveying equipment (including breakers and crushers), coal storage systems (excluding open storage piles), or coal transfer and loading systems</p> <p>Construction/Reconstruction/Modification Date = After October 24, 1974 and before April 28, 2008.</p> <p>Digital Opacity = The affected facility is not using a monitoring plan for a digital opacity compliance system.</p>
31EF-3	40 CFR Part 60, Subpart Y	60Y	<p>Affected Facility = Coal processing and conveying equipment (including breakers and crushers), coal storage systems (excluding open storage piles), or coal transfer and loading systems</p> <p>Construction/Reconstruction/Modification Date = Constructed after April 28, 2008.</p> <p>Control Device Type = Emissions are controlled by control equipment other than a wet scrubber.</p> <p>Compliance Option = Affected facility is complying with §60.255(b)(2).</p> <p>Digital Opacity = The affected facility is not using a monitoring plan for a digital opacity compliance system.</p>
FCP-1	40 CFR Part 60, Subpart Y	60Y	<p>Affected Facility = Coal processing and conveying equipment (including breakers and crushers), coal storage systems (excluding open storage piles), or coal transfer and loading systems</p> <p>Construction/Reconstruction/Modification Date = After October 24, 1974 and before April 28, 2008.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			Digital Opacity = The affected facility is not using a monitoring plan for a digital opacity compliance system.
FCP-1B	40 CFR Part 60, Subpart Y	60Y	Affected Facility = Coal processing and conveying equipment (including breakers and crushers), coal storage systems (excluding open storage piles), or coal transfer and loading systems Construction/Reconstruction/Modification Date = After October 24, 1974 and before April 28, 2008. Digital Opacity = The affected facility is not using a monitoring plan for a digital opacity compliance system.
GRP3	40 CFR Part 60, Subpart Y	60Y	Affected Facility = Coal processing and conveying equipment (including breakers and crushers), coal storage systems (excluding open storage piles), or coal transfer and loading systems Construction/Reconstruction/Modification Date = After October 24, 1974 and before April 28, 2008. Digital Opacity = The affected facility is not using a monitoring plan for a digital opacity compliance system.

\* - The "unit attributes" or operating conditions that determine what requirements apply

## NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

## New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room,

located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. In addition, many of the permits are accessible online through the link provided below. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. Permit by Rule (PBR) registrations submitted by permittees are also available online through the link provided below. The following table specifies the PBRs that apply to the site.

The TCEQ has interpreted the emission limits prescribed in 30 TAC §106.4(a) as both emission thresholds and default emission limits. The emission limits in 30 TAC §106.4(a) are all considered applicable to each facility as a threshold matter to ensure that the owner/operator qualifies for the PBR authorization. Those same emission limits are also the default emission limits if the specific PBR does not further limit emissions or there is no lower, certified emission limit claimed by the owner/operator.

This interpretation is consistent with how TCEQ has historically determined compliance with the emission limits prior to the addition of the “as applicable” language. The “as applicable” language was added in 2014 as part of changes to the sentence structure in a rulemaking that made other changes to address greenhouse gases and was not intended as a substantive rule change. This interpretation also provides for effective and practical enforcement of 30 TAC §106.4(a), since for the TCEQ to effectively enforce the emission limits in 30 TAC §106.4(a) as emission thresholds, all emission limits must apply. As provided by 30 TAC §106.4(a)(2) and (3), an owner/operator shall not claim a PBR authorization if the facility is subject to major New Source Review. The practical and legal effect of the language in 30 TAC § 106.4 is that if a facility does not emit a pollutant, then the potential to emit for that particular pollutant is zero, and thus, the facility is not authorized to emit the pollutant pursuant to the PBR.

The status of air permits, applications, and PBR registrations may be found by performing the appropriate search of the databases located at the following website:

[www.tceq.texas.gov/permitting/air/nav/air\\_status\\_permits.html](http://www.tceq.texas.gov/permitting/air/nav/air_status_permits.html)

Details on how to search the databases are available in the **Obtaining Permit Documents** section below.

#### **New Source Review Authorization References**

<b>Prevention of Significant Deterioration (PSD) Permits</b>	
PSD Permit No.: GHGPSDTX110	Issuance Date: 02/28/2018
PSD Permit No.: PSDTX24M2	Issuance Date: 02/28/2018
<b>Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.</b>	
Authorization No.: 145977	Issuance Date: 01/03/2019
Authorization No.: 5296	Issuance Date: 02/28/2018
<b>Permits By Rule (30 TAC Chapter 106) for the Application Area</b>	
Number: 106.144	Version No./Date: 09/04/2000
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.264	Version No./Date: 09/04/2000
Number: 106.371	Version No./Date: 09/04/2000
Number: 106.454	Version No./Date: 11/01/2001
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.473	Version No./Date: 09/04/2000



### **New Source Review Authorization References**

Number: 106.478	Version No./Date: 09/04/2000
Number: 106.511	Version No./Date: 09/04/2000
Number: 106.532	Version No./Date: 09/04/2000
Number: 84	Version No./Date: 09/23/1982
Number: 106	Version No./Date: 04/05/1995
Number: 118	Version No./Date: 04/05/1995
Number: 124	Version No./Date: 05/12/1981

### **Emission Units and Emission Points**

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

### **Monitoring Sufficiency**

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

### **Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected**

**Periodic Monitoring:**

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information	
ID No.: 31EF-1	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Y	SOP Index No.: 60Y
Pollutant: PM (Opacity)	Main Standard: § 60.254(a)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Once per month	
Averaging Period: Six-minutes	
Deviation Limit: 20% Opacity	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

Unit/Group/Process Information	
ID No.: 31EF-2	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Y	SOP Index No.: 60Y
Pollutant: PM (Opacity)	Main Standard: § 60.254(a)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Once per month	
Averaging Period: Six-minutes	
Deviation Limit: 20% Opacity	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

Unit/Group/Process Information	
ID No.: EEf-1	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(A)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Once per week	
Averaging Period: Six-minute	
Deviation Limit: 30% Opacity	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

Unit/Group/Process Information	
ID No.: EEf-2	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(A)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Once per week	
Averaging Period: Six-minute	
Deviation Limit: 30% Opacity	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

Unit/Group/Process Information	
ID No.: EEf-3	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(A)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Once per week	
Averaging Period: Six-minutes	
Deviation Limit: 30% Opacity	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

Unit/Group/Process Information	
ID No.: EEf-4	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(A)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Once per week	
Averaging Period: Six-minute	
Deviation Limit: 30% Opacity	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

Unit/Group/Process Information	
ID No.: EEf-5	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(A)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Once per week	
Averaging Period: Six-minute	
Deviation Limit: 30% Opacity	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	



Unit/Group/Process Information	
ID No.: EEf-6	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(A)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Once per week	
Averaging Period: Six-minute	
Deviation Limit: 30% Opacity	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

Unit/Group/Process Information	
ID No.: FCP-1	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Y	SOP Index No.: 60Y
Pollutant: PM (Opacity)	Main Standard: § 60.254(a)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Once per month	
Averaging Period: Six-minutes	
Deviation Limit: 20% Opacity	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

Unit/Group/Process Information	
ID No.: FCP-1B	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Y	SOP Index No.: 60Y
Pollutant: PM (Opacity)	Main Standard: § 60.254(a)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Once per month	
Averaging Period: Six-minutes	
Deviation Limit: 20% Opacity	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

Unit/Group/Process Information	
ID No.: GBH-1	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(C)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Once per week	
Averaging Period: Six-minutes	
Deviation Limit: 15% Opacity	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

Unit/Group/Process Information	
ID No.: GEF-3	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(A)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Once per week	
Averaging Period: Six-minute	
Deviation Limit: 30% Opacity	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

Unit/Group/Process Information	
ID No.: GEF-9	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(A)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Once per week	
Averaging Period: Six-minute	
Deviation Limit: 30% Opacity	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

Unit/Group/Process Information	
ID No.: GID34EX	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(C)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: Once per week	
Averaging Period: n/a	
Deviation Limit: 15% Opacity	
<p>Basis of monitoring: The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations. The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

Unit/Group/Process Information	
ID No.: GID5EX	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(A)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Once per week	
Averaging Period: Six-minutes	
Deviation Limit: 30% Opacity	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	



Unit/Group/Process Information	
ID No.: GRP3	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Y	SOP Index No.: 60Y
Pollutant: PM (Opacity)	Main Standard: § 60.254(a)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Once per month	
Averaging Period: Six-minutes	
Deviation Limit: 20% Opacity	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

Unit/Group/Process Information	
ID No.: KBH-9	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(C)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: Once per week	
Averaging Period: n/a	
Deviation Limit: 15% Opacity	
<p>Basis of monitoring: The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations. The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

Unit/Group/Process Information	
ID No.: KEF-10	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(C)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: Once per week	
Averaging Period: n/a	
Deviation Limit: 15% Opacity	
<p>Basis of monitoring: The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations. The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

Unit/Group/Process Information	
ID No.: KEF-3	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(A)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Once per week	
Averaging Period: Six-minute	
Deviation Limit: 30% Opacity	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

Unit/Group/Process Information	
ID No.: KEF-4	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(A)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Once per week	
Averaging Period: six-minute	
Deviation Limit: 30% Opacity	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

Unit/Group/Process Information	
ID No.: KEF-5	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(A)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Once per week	
Averaging Period: Six-minute	
Deviation Limit: 30% Opacity	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

Unit/Group/Process Information	
ID No.: KEF-6	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(A)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Once per week	
Averaging Period: Six minute	
Deviation Limit: 30% Opacity	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

Unit/Group/Process Information	
ID No.: KEF-7	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(A)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Once per week	
Averaging Period: Six-minute	
Deviation Limit: 30% Opacity	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	



Unit/Group/Process Information	
ID No.: KEF-9	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(A)
Monitoring Information	
Indicator: Opacity	
Minimum Frequency: Once per week	
Averaging Period: Six-minute	
Deviation Limit: 30% Opacity	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Opacity and visible emissions have been used as an indicator of particulate emissions in many federal rules including 40 CFR Part 60, Subpart F and Subpart HH. In addition, use of these indicators is consistent with the EPA's "Compliance Assurance Monitoring (CAM) Technical Guidance Document" (August 1998). Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations and the requirements of 40 CFR § 60.13 for a continuous opacity monitoring system (COMS). The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

Unit/Group/Process Information	
ID No.: KILN3	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111
Pollutant: Opacity	Main Standard: § 111.111(a)(1)(C)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: Once per week	
Averaging Period: n/a	
Deviation Limit: 15% Opacity	
<p>Basis of monitoring: The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations. The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

## Obtaining Permit Documents

The New Source Review Authorization References table in the FOP specifies all NSR authorizations that apply at the permit area covered by the FOP. Individual NSR permitting files are located in the TCEQ Central File Room (TCEQ Main Campus located at 12100 Park 35 Circle, Austin, Texas, 78753, Building E, Room 103). They can also be obtained electronically from TCEQ's Central File Room Online (<https://www.tceq.texas.gov/goto/cfr-online>). Guidance documents that describe how to search electronic records, including Permits by Rule (PBRs) or NSR permits incorporated by reference into an FOP, archived in the Central File Room server are available at [https://www.tceq.texas.gov/permitting/air/nav/air\\_status\\_permits.html](https://www.tceq.texas.gov/permitting/air/nav/air_status_permits.html)

All current PBRs are contained in Chapter 106 and can be viewed at the following website:

[https://www.tceq.texas.gov/permitting/air/permitbyrule/air\\_pbr\\_index.html](https://www.tceq.texas.gov/permitting/air/permitbyrule/air_pbr_index.html)

Previous versions of 30 TAC Chapter 106 PBRs may be viewed at the following website:

[www.tceq.texas.gov/permitting/air/permitbyrule/historical\\_rules/old106list/index106.html](http://www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html)

Historical Standard Exemption lists may be viewed at the following website:

[www.tceq.texas.gov/permitting/air/permitbyrule/historical\\_rules/oldselist/se\\_index.html](http://www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html)

Additional information concerning PBRs is available on the TCEQ website:

[https://www.tceq.texas.gov/permitting/air/nav/air\\_pbr.html](https://www.tceq.texas.gov/permitting/air/nav/air_pbr.html)

## Compliance Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on **January 25, 2018.**

Site rating: **0.00/High** Company rating: **0.00/High**

(High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55)

2. Has the permit changed on the basis of the compliance history or site/company rating? .....No

## Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS? .....No

2. Is a compliance plan and schedule included in the permit? .....No

## Available Unit Attribute Forms

OP-UA1 - Miscellaneous and Generic Unit Attributes

OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes

OP-UA3 - Storage Tank/Vessel Attributes

OP-UA4 - Loading/Unloading Operations Attributes

OP-UA5 - Process Heater/Furnace Attributes

OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes

OP-UA7 - Flare Attributes

OP-UA8 - Coal Preparation Plant Attributes

OP-UA9 - Nonmetallic Mineral Process Plant Attributes

OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes

OP-UA11 - Stationary Turbine Attributes

OP-UA12 - Fugitive Emission Unit Attributes

OP-UA13 - Industrial Process Cooling Tower Attributes

OP-UA14 - Water Separator Attributes

OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes

OP-UA16 - Solvent Degreasing Machine Attributes

OP-UA17 - Distillation Unit Attributes

OP-UA18 - Surface Coating Operations Attributes

OP-UA19 - Wastewater Unit Attributes

OP-UA20 - Asphalt Operations Attributes  
OP-UA21 - Grain Elevator Attributes  
OP-UA22 - Printing Attributes  
OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes  
OP-UA25 - Synthetic Fiber Production Attributes  
OP-UA26 - Electroplating and Anodizing Unit Attributes  
OP-UA27 - Nitric Acid Manufacturing Attributes  
OP-UA28 - Polymer Manufacturing Attributes  
OP-UA29 - Glass Manufacturing Unit Attributes  
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes  
OP-UA31 - Lead Smelting Attributes  
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes  
OP-UA33 - Metallic Mineral Processing Plant Attributes  
OP-UA34 - Pharmaceutical Manufacturing  
OP-UA35 - Incinerator Attributes  
OP-UA36 - Steel Plant Unit Attributes  
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes  
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes  
OP-UA39 - Sterilization Source Attributes  
OP-UA40 - Ferroalloy Production Facility Attributes  
OP-UA41 - Dry Cleaning Facility Attributes  
OP-UA42 - Phosphate Fertilizer Manufacturing Attributes  
OP-UA43 - Sulfuric Acid Production Attributes  
OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes  
OP-UA45 - Surface Impoundment Attributes  
OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes  
OP-UA47 - Ship Building and Ship Repair Unit Attributes  
OP-UA48 - Air Oxidation Unit Process Attributes  
OP-UA49 - Vacuum-Producing System Attributes  
OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes  
OP-UA51 - Dryer/Kiln/Oven Attributes  
OP-UA52 - Closed Vent Systems and Control Devices  
OP-UA53 - Beryllium Processing Attributes  
OP-UA54 - Mercury Chlor-Alkali Cell Attributes  
OP-UA55 - Transfer System Attributes  
OP-UA56 - Vinyl Chloride Process Attributes  
OP-UA57 - Cleaning/Depainting Operation Attributes  
OP-UA58 - Treatment Process Attributes  
OP-UA59 - Coke By-Product Recovery Plant Attributes  
OP-UA60 - Chemical Manufacturing Process Unit Attributes  
OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes  
OP-UA62 - Glycol Dehydration Unit Attributes  
OP-UA63 - Vegetable Oil Production Attributes